



January 21, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: United States Cellular Corporation ("U.S. Cellular")

*Modernizing the Form 477 Data Program*, WC Docket No. 11-10, Notice of Proposed Rulemaking, 26 FCC Rcd 1508 (2011).

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, U.S. Cellular hereby provides you with notice of an oral ex parte discussion in connection with the above-captioned proceeding. On January 17, 2013, Bill Tortoriello and Jim Wright of U.S. Cellular along with the undersigned, spoke via telephone with Susan Singer, Tom Peters, Mitali Shah, Nese Guendelsberger, Lisa Gelb, Steve Rosenberg, Travis Litman, Ken Lynch, Chelsea Fallon, and Ellen Burton.

During the course of the conference, U.S. Cellular learned that the Commission is considering revisions to its Form 477 data collection practices. Specifically, the Commission inquired about U.S. Cellular's position with respect to a prospective FCC client-side application that would essentially auto-load a carrier's broadband data, potentially improving data collection efforts and the carrier's burden time for reporting. We expressed that the proposed Form 477 filing application would likely keep consistent or reduce the amount of effort needed to file broadband data.

The Commission also asked about the granularity of data collected, if census tract information remains viable, and reporting practices with respect to prepaid devices. We discussed that census tract reporting continues to make sense, and geocoding at a more granular level poses some challenges with respect to the sensitivity of data collection.

Additionally, the Commission discussed potentially housing broadband deployment data in lieu of the now separate NTIA submission process. We agreed that the consolidation of the NTIA Broadband Data collection efforts in conjunction with FCC Form 477

reporting would significantly reduce the effort now needed to file specific NTIA state-based requests, as most contain unique filing criteria. Overall, U.S. Cellular remained open to the Commission's efforts to streamline its broadband data collection practices.

Sincerely,

/S/

Grant B Spellmeyer, Esq.  
Executive Director – Federal Affairs & Public Policy